Himachal Pradesh State Electricity Board Limited
(A State Govt. Undertaking)
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No.HPSEBL/R&ALDC/CERC- (GNA)/2018-4493-94 Dated: 6/8/18

To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
16 Janpath, New Delhi 110 001.

Sub: Comments of HPSEBL (DISCOM) on Draft Grant of Connectivity and General Network Access to Inter-state Transmission system and other related matters) Regulations, 2017 thereof.

Sir,

In reference to the subject cited draft regulation placed at CERC website, the comments of HPSEBL on the specific clauses are appended as under:

HPSEBL after scrutiny of draft regulations apprehends that there may be additional fiscal burden on DISCOMs which should be averted and the anomalies thereof faced by the DISCOMs in usual operational issues under the regime of past provisions of regulations should be surpassed by the present ensuing regulations and it must provide economical means of reduction in construction time of transmission network.

Clause-2.1(d) (ii), 12.3, 12.4, 12.5 & 12.6:

When Clause-2.1(d) (iii) is read with 12.3, 12.4, 12.5 & 12.6, it gives an apprehension that any entity seeking access through GNA need not to take the consent of the respective DISCOM and further silence of this very aspect in the regulation gives an understanding that the said entity may straight take GNA connectivity/access by just taking NOC from STU and the concurrence of respective DISCOMs has no sanctity. Under such speculations, there is every chance that the entity seeking such access may misuse the provisions. Hon'ble Commission may see this aspect while finalizing draft regulations. It is further added that the provision of deemed GNA may further prove fatal to the system wherein the entity seeking such access may even surpass many of the provisions/shortcomings and thus in long run the same may construe violation of the prevalent regulations.

Clause-2.1(q):

In the draft regulations, General Network Access (GNA) is defined as the nondiscriminatory access to the ISTS granted by the CTU to an applicant for an estimated maximum injection/drawl for a specified period. Whereas HPSEBL apprehends that the maximum injection/drawl in a specified period shall be different and even inverse in nature at different IST points in real time operations and hence modalities so drawn out of the definition needs to be further elaborated with reference to the algebraic summation of drawl and injection at different nods in a specific period.
**Clause 2.2 of Explanatory Memorandum:**

This clause envisages that additional transmission charges for drawal shall be levied in case it exceeds 20% of the approved drawal requirement from ISTS and this shall amount to pay 25% extra PoC charges. HPSEBL speculates whether the provisions of deviation settlement mechanism shall also remain in force side by side which also provides additional surcharge on drawal against the specific percentage of 12% of the schedule and also feels that such provisions being kept in the draft regulation may put additional fiscal burden on DISCOMs on account of violations. It is pertinent to mention here that HP being hydro dependent State, depends 80% on hydro for its availability and 20% on its committed shares from Centre Sector. Under jeopardize conditions, when the abrupt closure of hydro plants takes place owing to excess silt contents/floods, results into excess drawal from the ISTS nods. Such eventualities are considered as violations and attracts settlement under the provisions of deviation settlement mechanism to the extent whatsoever it amounts to be. HPSEBL prays Hon'ble CERC not to levy extra PoC charges under such catastrophic conditions when the drawal of the hydro State jumps exorbitantly over and above the approved drawal from ISTS.

It is further added to the discussions that all revisions in real time operations are done by NRLDC and this is affecting the drawal of DISCOMs from the ISTS. This very point avoids a utility to take stringent decision of drawal from ISTS points and over rules the precise estimations of GNA.

**Clause 2.19.1(c)(vi) of Explanatory Memorandum:**

The draft regulation under the said clause is silent on the mechanism of recovery of transmission charges from the intra-state open access customers who intend to avail a part of GNA. It is asserted here that DISCOMs have to pay LTOA, MTOA and STOA in PoC-I billing whereas in the absence of recovery of such transmission charges which otherwise open access customers under short term open access are supposed to pay and the due credit of the same, as per the provisions, is to be passed on to the DISCOMs having Long Term Open Access of the CTU system, the legitimate settlement of such charges shall not be possible. HPSEBL prays Hon'ble CERC to inbuilt some recovery mechanism to offset the impact of additional financial burden on DISCOMs.

Yours faithfully,

[Signature]

Chief Engineer (Sys. Op),
HPSEBL, Vidyut Bhawan,
Shimla-4

Copy forwarded to the Member Secretary, NRPC, 18-A, Shaheed Jeet Singh Marg, Kawanwala Sarai, New Delhi for information please.

[Signature]

Chief Engineer (Sys. Op),
HPSEBL, Vidyut Bhawan,
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